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November 21, 2001

## VIA ELECTRONIC SUBMISSION

Magalie Roman Salas, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: **NOTICE OF EX PARTE MEETING**  
CC Docket No. 94-102  
RM-8143  
Compatibility with Enhanced 911 Emergency Calling Systems

Dear Ms. Salas:

On November 21, 2001, George Marble, Vice President, Marketing, Grayson Wireless Division ("Grayson") of Allen Telecom, Inc. ("Allen") and I had an *ex parte* meeting with representatives of the Wireless Telecommunications Bureau ("Bureau") regarding the above-referenced docket. Representing the Bureau were Thomas Sugrue, Kris A. Monteith and Joel Taubenblatt.

In accordance with FCC requests, we provided a further status update regarding the deployment of Grayson's Geometrix® network-based wireless 911 location system. A copy of the materials that were used during the discussion is enclosed herewith. As reported earlier, a Geometrix® system has been installed and tested, and as of October 22, 2001, has been in service in St. Clair County, Illinois. This is the first E911 Phase II caller location system in service in the United States. Geometrix® system equipment was installed at existing cell sites and connected to existing cell site antennas. Pre-service system testing for CDMA and AMPS yielded overall accuracy within 53 meters at the 67<sup>th</sup> percentile and 132 meters at the 95<sup>th</sup> percentile, well within the FCC E911 Phase II accuracy requirements for a network-based caller location solution. As can be seen in the enclosure, the system tests demonstrated Phase II-compliant accuracy in suburban, rural and highway environments. (There are no urban areas in St. Clair County. The "PSAP Selected" results are for particular locations selected by the PSAP for testing.)

In addition, a second Geometrix® system has also been installed and tested, and as of November 5, 2001, has been in service in Lake County, Indiana. Pre-service testing for CDMA

and AMPS demonstrated overall accuracy within 49 meters at the 67<sup>th</sup> percentile and 103 meters at the 95<sup>th</sup> percentile. The system tests yielded Phase II-compliant results in urban, suburban, rural and highway environments.

Very truly yours,

Eliot J. Greenwald

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